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LEONARD R. RAISH  
JAMES P. RILEY  
DAVID N. ROBERTS\*  
MARVIN ROSENBERG  
LONNA M. THOMPSON  
HOWARD M. WEISS  
\*ADMITTED IN TEXAS ONLY

FLETCHER, HEALD & HILDRETH

ATTORNEYS AT LAW

SUITE 400, 1225 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036-2679

P. O. BOX 33847

WASHINGTON, D.C. 20033-0847

(202) 828-5700

TELECOPIER NUMBER

(202) 828-5786

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FRANK U. FLETCHER

TELECOMMUNICATIONS CONSULTANT

HON. ROBERT E. LEE

WRITER'S NUMBER  
(202) 828-

5770

November 3, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Attention: Allocations Branch

RE: MM Docket No. 92-214  
RM-8062  
Columbia and Bourbon, Missouri

Dear Ms. Searcy:

Transmitted herewith, on behalf of Al Greenfield, d/b/a The Greenfield Group, Receiver, licensee and proposed assignor of KCMQ(FM), Columbia, Missouri, and Zimmer Radio of Mid-Missouri, Inc., proposed assignee of KCMQ(FM), are an original and four copies of their Joint Comments in the above-referenced proceeding.

Should any questions arise concerning this matter, please contact this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH

*Frank R. Jazzo*  
Frank R. Jazzo  
Counsel for  
Zimmer Radio of  
Mid-Missouri, Inc.

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) MM Docket No. 92-214  
Table of Allotments ) RM-8062  
FM Broadcast Stations )  
(Columbia and Bourbon, Missouri) )

To: Chief, Allocations Branch

**JOINT COMMENTS**

Al Greenfield, d/b/a The Greenfield Group, Receiver ("Greenfield"), licensee of Station KCMQ(FM), Channel 244C3,<sup>1</sup> Columbia, Missouri, and Zimmer Radio of Mid-Missouri, Inc. ("ZRMMI"), proposed assignee of KCMQ(FM) (BAPLH-921015EB), by its attorney, hereby submit their Joint Comments in support of the substitution of Channel 244C1 for Channel 244C3 at Columbia, Missouri, and the corresponding modification of the license of KCMQ(FM) to specify operation thereon as proposed in the Notice of Proposed Rule Making in the above-captioned proceeding, DA 92-1163, released September 22, 1992 ("NPRM"). In support thereof, the following is stated:

1. On July 30, 1992, Greenfield filed his "Petition for Rulemaking and Request for Modification of Authorization" (RM-8062). On September 22, 1992, the FCC released the above-referenced NPRM in response to Greenfield's petition.

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<sup>1</sup> KCMQ(FM) is presently licensed on Channel 244A at Columbia, Missouri (BLH-4969). Greenfield holds a construction permit to upgrade KCMQ(FM)'s facilities to Class C3 (BPH-911021IF). An application is pending to modify that construction permit (BMPH-920901ID).

2. Greenfield hereby restates his support for the substitution of Channel 244C1 for Channel 244C3 at Columbia, Missouri, and the corresponding modification of KCMQ(FM)'s license to specify operation thereon. Greenfield will promptly apply for a construction permit for and expeditiously construct upgraded facilities for KCMQ(FM).

3. ZRMMI is the proposed assignee of KCMQ(FM). ZRMMI anticipates that the KCMQ(FM) assignment application will have been approved and ZRMMI will be the licensee of KCMQ(FM) prior to the release of a Report and Order in this proceeding. ZRMMI hereby states its support for the upgrade of KCMQ(FM). In the event Channel 244C1 is substituted for Channel 244C3 at Columbia, Missouri, and KCMQ(FM)'s license is modified to specify operation thereon while ZRMMI is the licensee, ZRMMI will expeditiously apply for authority and construct upgraded facilities for KCMQ(FM) upon approval.

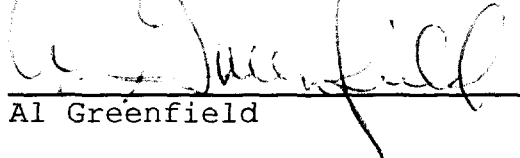
4. Since Channel 244C1 is a higher class co-channel, the FCC may upgrade KCMQ(FM)'s channel and modify its license without considering competing expressions of interest or the availability of an equivalent or higher class channel at Columbia, Missouri, in accordance with Section 1.420(g)(3) of the FCC's Rules. The public interest will be served by upgrading KCMQ(FM)'s channel of operation because additional people will be able to receive KCMQ(FM)'s service. Greenfield and ZRMMI take no position with respect to whether Channel 297A should be substituted for Channel 244A at Bourbon, Missouri, or whether Channel 244A should be deleted at Bourbon, Missouri. Either option is acceptable to Greenfield and ZRMMI.

WHEREFORE, for the foregoing reasons, Greenfield and ZRMMI respectfully request that Channel 244C1 be substituted for Channel 244C3 at Columbia, Missouri, and that the license of KCMQ(FM) be modified to specify operation thereon.

By my signature below, I verify under penalty of perjury that the information provided in these Joint Comments is true and correct.

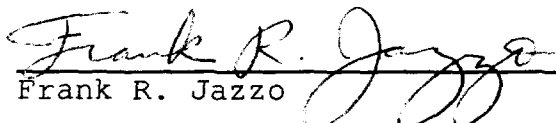
Respectfully submitted,

AL GREENFIELD DBA THE  
GREENFIELD GROUP, RECEIVER

  
Al Greenfield

207 W. Clarendon, Suite 10E  
Phoenix, Arizona 85013

ZIMMER RADIO OF MID-MISSOURI, INC.

By:   
Frank R. Jazzo  
Its Attorney

FLETCHER, HEALD & HILDRETH  
1225 Connecticut Avenue, N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 828-5700

Dated: November 3, 1992